

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
VICTORIA DIVISION**

In re:	)	
	)	
INFOW, LLC, <i>et al.</i> ,	)	Case No. 22 - 60020
	)	
Debtors. <sup>1</sup>	)	Chapter 11 (Subchapter V)
	)	
	)	Jointly Administered

**WITNESS AND EXHIBIT LIST  
[Related to ECF Nos. 6 and 7]**

Judge:	Christopher M. Lopez
Parties Name:	InfoW, LLC; IWHealth, LLC and Prison Planet TV, LLC
Attorney's Name:	Kyung S. Lee; R.J. Shannon
Attorney's Telephone:	713-715-1660
Nature of Proceeding:	<p>Debtors' Emergency Motion for Order Authorizing Appointment of Russell F. Nelms and Richard S. Schmidt as Trustees of the 2022 Litigation Settlement Trust and Granting Related Relief [ECF No. 6]</p> <p>and</p> <p>Debtors' Emergency Application for Interim and Final Orders (A) Authorizing Employment of W. Marc Schwartz as Chief Restructuring Officer, (B) Authorizing Employment of Staff of Schwartz Associates, LLC in Discharge of Duties as Chief Restructuring Officer, and (C) Granting Related Relief [ECF No. 7]</p>

InfoW, LLC ("InfoW"), IWHealth, LLC ("IW Health"), and Prison Planet TV, LLC ("Prison Planet TV", and together with InfoW and IW Health, the "Debtors"), the debtors and debtors-in-possession in the above-captioned chapter 11 cases, by and through counsel of record, hereby submits this Witness and Exhibit List (the "Witness and Exhibit List") in connection with the hearing scheduled for Friday, April 22, 2022 at 9:00 A.M. prevailing Central Time (the

<sup>1</sup> The Debtors in these chapter 11 cases along with the last four digits of each Debtor's federal tax identification number are as follows: InfoW, LLC, f/k/a Infowars, LLC (6916), IWHealth, LLC f/k/a Infowars Health, LLC (no EIN), Prison Planet TV, LLC (0005). The address for service to the Debtors is PO Box 1819, Houston, TX 77251-1819.

“Hearing”) on the *Debtors’ Emergency Motion for Order Authorizing Appointment of Russell F. Nelms and Richard S. Schmidt as Trustees of the 2022 Litigation Settlement Trust and Granting Related Relief* [ECF No. 6] and the *Debtors’ Emergency Application for Interim and Final Orders (A) Authorizing Employment of W. Marc Schwartz as Chief Restructuring Officer, (B) Authorizing Employment of Staff of Schwartz Associates, LLC in Discharge of Duties as Chief Restructuring Officer, and (C) Granting Related Relief* [ECF No. 7].

### **WITNESSES**

The Debtors may call any of the following witnesses at the Hearing, whether in person, video or by proffer:

1. Marc Schwartz;
2. Richard S. Schmidt;
3. Russell M. Nelms;
4. Any witness(es) called or designated by another party; and
5. Any witness(es) necessary to rebut the testimony of any witness(es) called or designated by any other party.

### **EXHIBITS<sup>2</sup>**

The Debtors may offer for admission into evidence any of the following exhibits at the trial:

<b>Ex.</b>	<b>Description</b>	<b>Offered</b>	<b>Objection</b>	<b>Admitted/ Not Admitted</b>	<b>Disposition</b>
1.	Debtors’ Emergency Motion for Order Authorizing Appointment of Russell F. Nelms and Richard S. Schmidt as Trustees of the Litigation Settlement Trust and Granting Related Relief [ECF No. 6]				

<sup>2</sup> Unless otherwise specified, all exhibits in this Witness and Exhibit List contain all attachments that were included in the filing of such document.

<b>Ex.</b>	<b>Description</b>	<b>Offered</b>	<b>Objection</b>	<b>Admitted/ Not Admitted</b>	<b>Disposition</b>
2.	Curriculum Vitae of Russell M. Nelms				
3.	Curriculum Vitae of Richard S. Schmidt				
4.	Debtors' Emergency Application for Interim and Final Orders (A) Authorizing Employment of W. Marc Schwartz as Chief Restructuring Officer, (B) Authorizing Employment of Staff of Schwartz & Associates, LLC in Discharge of Duties as Chief Restructuring Officer, and (C) Granting Related Relief [ECF No. 7]				
5.	Curriculum Vitae of W. Marc Schwartz. CPA/CFF, CFE				
6.	Corporate Organization Chart				

The Debtors reserve the right to supplement, amend or delete any witness and exhibit prior to the Hearing. The Debtors also reserve the right to use any exhibit presented by any other party and to ask the Court to take judicial notice of any document. Finally, the Debtors reserve the right to introduce exhibits previously admitted.

*[Remainder of Page Intentionally Left Blank]*

Dated: April 21, 2022

Respectfully Submitted,

/s/Kyung S. Lee

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*Proposed Counsel to the Debtors and  
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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was duly served by electronic transmission to all registered ECF users appearing in the case as of the date of this filing and to the parties listed below:

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/s/R. J. Shannon  
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